



J. Carlton Courter, III  
Commissioner

# COMMONWEALTH of VIRGINIA

## Department of Agriculture and Consumer Services

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May 22, 1998

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
12420 Parklawn Drive, Room 1-23  
Rockville, MD 20857

RE: Docket Number 97N-0451

This letter is to provide comments in response to the recent publication of the *Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables*, released for comment on April 13, 1998 as Docket Number 97N-0451.

The Virginia Department of Agriculture and Consumer Services (VDACS) supports the utilization of this guide as the most appropriate guidance currently available to reduce the risk of microbial contamination of fresh fruits and vegetables. Additionally, VDACS believes that voluntary adherence to such guidelines is the most appropriate route of implementation for the following reasons:

- It has only been within the relatively recent past that microbiological safety of fresh fruits and vegetables has become a concern;
- Many traditional agricultural practices which have not been questioned for years will need to be changed, along with the philosophies of many of the producers of these commodities;
- Most of the principles outlined in the guidance document are reasonable and should not be difficult to implement. However, certain issues identified within this document, as noted below, may be extremely challenging and costly for producers of fresh fruits and vegetables to develop effective methods to manage:
  - ▶ Water sources for irrigation water, and changes in methods of irrigation;
  - ▶ Toilet facilities and handwashing stations;
  - ▶ Training of employees in proper sanitation and hygiene, particularly with respect to operations that utilize a labor force composed predominantly of transient laborers.

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VDACS believes that the concept of developing good agricultural practices through the utilization of this guidance document and other technological advances as they become available will lead to enhanced safety of fresh fruits and vegetables. The production and maintenance of a safe food supply has a high priority at VDACS. Virginia producers are also interested in providing consumers with the safest, highest quality fresh fruits and vegetables available.

VDACS appreciates the opportunity to offer comments concerning the food safety issues identified within this guidance document.

Sincerely,



J. Carlton Courter, III  
Commissioner

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DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES  
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